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*Counsel for Defendant Google LLC*

**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION**

CHASOM BROWN, WILLIAM BYATT,  
JEREMY DAVIS, CHRISTOPHER  
CASTILLO, and MONIQUE TRUJILLO,  
individually and on behalf of all similarly  
situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 5:20-cv-03664-LHK-SVK

**DECLARATION OF JONATHAN TSE IN  
SUPPORT OF PLAINTIFFS'  
ADMINISTRATIVE MOTION TO SEAL  
DOCUMENTS ( DKT. 370)**

Referral: Hon. Susan van Keulen, USMJ

1 I, Jonathan Tse, declare as follows:

2 1. I am a member of the bar of the State of California and an attorney at Quinn Emanuel  
3 Urquhart & Sullivan, LLP, attorneys for Defendant Google LLC (“Google”) in this action. I make  
4 this declaration of my own personal, firsthand knowledge, and if called and sworn as a witness, I  
5 could and would testify competently thereto.

6 2. I am making this declaration pursuant to Civil Local Rule 79-5(e)-(f) as an attorney  
7 for Google as the Designating Party, pursuant to Civil Local Rule 79-5(f)(3) in response to Dkt.  
8 370.

9 3. On December 31, 2021, Plaintiffs filed an Administrative Motion to File Under Seal  
10 portions of its Motion for Relief from Case Management Schedule (Dkt. 370). On December 31,  
11 2021, I received an unredacted service copy of these documents. .

12 4. I have reviewed the documents that Plaintiffs seek to file under seal pursuant to Civil  
13 Local Rule 79-5, unredacted versions of which have been filed at Docket Entry 370. Based on my  
14 review, there is good cause to seal the following information:

Document	Basis for Sealing
Plaintiffs’ Motion for Relief from Case Management Schedule (Dkt. 370-1)  Pages 3:16, 5:16-18, 5:20-21, 8:7, 9:1, 9:3, 11:26, 12:13-18, 12:20-21, 12:23-26, 13:3-11, 13:17, 13:23-26, 14:8-9, 14:12-13, 14:16, 14:20, 14:24, 14:26, 15:13, 18:6-7, 18:11, 18:17-18, 20:13, 20:15, 20:26, 21:1, 21:26, 22:1, 22:4-6, 22:9-14	The information requested to be sealed contains Google’s highly confidential and proprietary information regarding highly sensitive features of Google’s internal systems and operations, including details related to internal identifiers, cookies, projects, logs, and analyses, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google’s competitors. Such confidential and proprietary information reveals Google’s internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google’s competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cyber security threats, as third parties may seek to use the information to compromise Google’s internal practices relating to competing products.
Declaration of Mark Mao in Support of Plaintiffs’ Motion for Relief from Case	The information requested to be sealed contains Google’s highly confidential and proprietary information regarding highly sensitive features of Google’s internal systems and operations, including details related to internal identifiers,

1 2 3 4 5 6 7 8 9	Management Schedule. (Dkt. 370-3)  Pages 2:17-19, 2:22, 5:7, 5:8-10, 5:12-13, 5:22-23, 6:4-5, 6:8, 6:12-13, 7:2, 7:8, 7:12	cookies, projects, logs, and analyses, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cyber security threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
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11 5. Google's request is narrowly tailored in order to protect its confidential information.  
12 These redactions are limited in scope and volume. Because the proposed redactions are narrowly  
13 tailored and limited to portions containing Google's highly-confidential or confidential information,  
14 Google requests that the portions of the aforementioned documents be redacted from any public  
15 version of those documents.

16 6. Google has pared back Plaintiffs' proposed redactions and does not seek to redact or  
17 file under seal any of the remaining portions of Plaintiffs' Motion and Proposed Order not indicated  
18 in the table above.

19 I declare under penalty of perjury of the laws of the United States that the foregoing is true  
20 and correct. Executed in San Francisco, California on January 7, 2022.

21  
22 DATED: January 7, 2022

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

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25 By /s/ Jonathan Tse  
Jonathan Tse

26 *Attorney for Defendant*  
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